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Attorneys for Creditor Ronnie Jordan

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

In re:  
THE ORIGINAL MOWBRAY TREE  
SERVICE, INC.,  
Debtor(s)

In re:  
MOWBRAY WATERMAN PROPERTY,  
LLC,  
Debtor(s)

In re:  
ROBIN ELAINE MOWBRAY  
Debtor(s)

X Affects all Debtors

Chapter 11

LEAD CASE NO.: 8:24-bk-12674-SC  
JOINTLY ADMINISTERED WITH:  
CASE NO. 8:25-bk-10542-SC  
CASE NO. 8:25-bk-10543-SC

**CREDITOR RONNIE JORDAN'S  
RESERVATION OF RIGHTS  
CONCERNING FEE APPLICATIONS OF  
DEBTORS' PROFESSIONALS**

**Hearing:**

Date: November 18, 2025  
Time: 10:00 a.m.  
Place: Courtroom 5C  
411 West Fourth Street.  
Santa Ana, CA 92701

1	_____	Affects The Original Mowbray Tree Service, Inc.
2	_____	Affects Mowbray Waterman Property, LLC
3	_____	Affects Robin Elaine Mowbray
4	_____	Debtor(s)

Creditor Ronnie Jordan hereby reserves his right to object to all interim fees awarded when final fee applications are filed, as well as to certain employment orders.

Dated: November 4, 2025

Respectfully submitted by:

**GOE FORSYTHE & HODGES LLP**

By: /s/Robert P. Goe  
 Robert P. Goe  
 Jeffrey W. Broker  
 Charity J. Manee  
 Attorneys for Creditor Ronnie Jordan

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 17701 Cowan, Suite 210, Building D, Irvine, CA 92614

A true and correct copy of the foregoing document entitled (*specify*): **CREDITOR RONNIE JORDAN'S RESERVATION OF RIGHTS CONCERNING FEE APPLICATIONS OF DEBTORS' PROFESSIONALS** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On November 4, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) November 4, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) November 4, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

- The Honorable Scott Clarkson, USBC, 411 West Fourth Street, Suite 5130, Santa Ana, CA 92701

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 4, 2025  
*Date*

Kerry A. Murphy  
*Printed Name*

/s/Kerry A. Murphy  
*Signature*

1 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

2 Mailing Information for Case 8:24-bk-12674-SC  
3 **Electronic Mail Notice List**

4 The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- 5 • Shraddha Bharatia notices@becket-lee.com
- 6 • Jeffrey W Broker jbroker@brokerlaw.biz
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